

## REMARKS

Claims 1-23 are pending at the time of the Office Action. In the Office Action mailed on January 22, 2008, the Examiner took the following action: ((1) requested the completion of co-pending application information; (2) rejected Claims 2-8 and 10-23 under 35 U.S.C. §112, second paragraph, as being indefinite; (3) held the examination of Claims 2-8 and 10-23 in abeyance; and (4) rejected Claims 1 and 9 under 35 U.S.C. §102(e) as being anticipated by Hill et al (U.S. 6,453,209). Claims 1-3, 5, 8-10, 13, 17, and 20-22 are amended, and Claims 4 and 12 are canceled. Applicants respectfully request reconsideration of the application in view of the foregoing amendments and the following remarks.

### *I. Rejection under 35 U.S.C. §112*

Claims 2-8 and 10-23 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctively claim the subject matter which Applicants regard as the invention. Applicants have amended Claims 2-3, 8, 10, 17, and 20 to recite a "product line number of the product" instead of "definition of the function deliverable of the product." Applicants respectfully submit that "product line number of the product," is at least supported under 35 U.S.C. §112 by Page 4, Lines 8-10 of the Specification. Accordingly, Applicants respectfully request reconsideration and withdrawal of this rejection.

### *II. Rejection under 35 U.S.C. §102(e)*

#### Claim 1

Claim 1 is rejected under 35 U.S.C. §102(e) as being anticipated by Hill. Claim 1, as amended, recites:

1. A system for presenting a build plan of a product, the system comprising:

- an input device for allowing a user to enter product information and generating a signal based on the entered product information;
- an output device; and
- a processor coupled to the output device and the input device, the processor including:
  - a first component for selecting a build plan based on the generated signal, the build plan includes tool information identified based on the entered product information, wherein the tool information includes a tool version identified from a plurality of tool versions; and
  - a second component for outputting the selected build plan to the output device.

Applicants respectfully traverse the rejection. Specifically, Hill does not recite, “a first component for selecting a build plan based on the generated signal, the build plan includes *tool information* identified based on the entered product information, wherein the *tool information* includes a tool version identified from a plurality of tool versions,” as claimed in Claim 1. (Emphasis added).

Instead, Hill is silent with respect to tool versions. Hill discloses an equipment development description system 108 that provides tooling and cost information to a process sheet data module 98 to generate process sheet data. (Column 3, Lines 64-66; Figure 2). Hill further discloses “a station scroll module 120 that uses process sheet data in order to associate which process sheet data should be associated with what part numbers, at what station number, and with what tools.” (Column 4, Lines 9-17).

However, while Hill discloses the association of process sheet data with tools, Hill does not disclose “a plurality of tool versions,” or that its station scroll module 120 is capable of associating a tool version that is “identified from a plurality of tool versions,” with specific process sheet data. Indeed, Hill is silent with respect to “tool versions,” as claimed in Claim 1. Accordingly, Hill does not recite, “the build plan includes *tool information* identified based on the entered product information, wherein the *tool information* includes a tool version identified from a plurality of tool versions,” as claimed in Claim 1. (Emphasis added). Thus, Claim 1 is allowable over the cited reference to Hill.

### Claim 9

Claim 9 is rejected under 35 U.S.C. §102(e) as being anticipated by Hill. Applicants respectfully traverse the rejection. Specifically, Applicants incorporate the reasoning presented above in response to the rejection of Claim 1 under 35 U.S.C. § 102(e) to the extent that the claims recite the same features. Accordingly, Applicants respectfully submit that Hill does not recite, "selecting a build plan based on the generated signal, the build plan includes *tool information* identified based on the entered product information, wherein the *tool information includes a tool version identified from a plurality of tool versions*," as claimed in Claim 9. (Emphasis added). Thus, Claim 9 is allowable over the cited reference to Hill.

### *III. Claims Held in Abeyance*

#### Claims 2-8 and 10-23


The Office Action states that the examination of Claims 2-8 and 10-23 is held in abeyance until such time that clear and meaningful claims are presented. Applicants have amended Claims 2-3, 8, 10, 17, and 20 to recite a "product line number of the product" instead of "definition of the function deliverable of the product." Additionally, Applicants have canceled Claims 4 and 12. Accordingly, Applicants respectfully request favorable examination of Claims 2-3, 5-8, 10-11, 13-23.

### CONCLUSION

Applicants respectfully submit that pending Claims 1-3, 5-11, and 13-23 are now in condition for allowance. If there are any remaining matters that may be handled by telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

Respectfully Submitted,

Dated: 5-5-08

By:   
Elliott Y. Chen  
Lee & Hayes, PLLC  
Reg. No. 58,293  
(206) 315-7914